

**DECLARATION OF
CARL SPILLY IN
SUPPORT OF
MOTION TO
EXCLUDE
OPINIONS OF
PLAINTIFFS'
EXPERT
DAVID NELSON**

QUINN EMANUEL URQUHART & SULLIVAN, LLP

Andrew H. Schapiro (admitted *pro hac vice*)
andrewschapiro@quinnemanuel.com
191 N. Wacker Drive, Suite 2700
Chicago, IL 60606
Telephone: (312) 705-7400
Facsimile: (312) 705-7401

Diane M. Doolittle (CA Bar No. 142046)
dianedoolittle@quinnemanuel.com
555 Twin Dolphin Drive, 5th Floor
Redwood Shores, CA 94065
Telephone: (650) 801-5000
Facsimile: (650) 801-5100

Stephen A. Broome (CA Bar No. 314605)
stephenbroome@quinnemanuel.com
Viola Trebicka (CA Bar No. 269526)
violatrebicka@quinnemanuel.com
865 S. Figueroa Street, 10th Floor
Los Angeles, CA 90017
Telephone: (213) 443-3000
Facsimile: (213) 443-3100

Josef Ansorge (admitted *pro hac vice*)
josefansorge@quinnemanuel.com
Carl Spilly (admitted *pro hac vice*)
carlspilly@quinnemanuel.com
1300 I. Street, N.W., Suite 900
Washington, D.C. 20005
Telephone: 202-538-8000
Facsimile: 202-538-8100

Jonathan Tse (CA Bar No. 305468)
jonathantse@quinnemanuel.com
50 California Street, 22nd Floor
San Francisco, CA 94111
Telephone: (415) 875-6600
Facsimile: (415) 875-6700

Jomaire A. Crawford (admitted *pro hac vice*)
jomairecrawford@quinnemanuel.com
51 Madison Avenue, 22nd Floor
New York, NY 10010
Telephone: (212) 849-7000
Facsimile: (212) 849-7100

Attorneys for Defendant Google LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO,
individually and on behalf of all similarly
situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 5:20-cv-03664-LHK-SVK

**DECLARATION OF CARL SPILLY IN
SUPPORT OF MOTION TO EXCLUDE
OPINIONS OF PLAINTIFFS' EXPERT
DAVID NELSON**

Judge: Hon. Yvonne Gonzalez Rogers

Date: September 20, 2022

Time: 2:00 p.m.

Location: Courtroom 1 – 4th Floor

DECLARATION OF CARL SPILLY

I, Carl Spilly, declare as follows:

1. I am a member of the bar of the District of Columbia and an associate with Quinn Emanuel Urquhart & Sullivan, LLP, attorneys for Defendants Google LLC (“Google”) in this action. I make this declaration of my own personal, firsthand knowledge, and if called and sworn as a witness, I could and would testify competently thereto.

2. Attached hereto as Exhibit A is a true and correct copy of the transcript of the July 6, 2022 deposition of Plaintiffs’ Rebuttal Expert David Nelson.

3. Attached hereto as Exhibit B is a true and correct copy of an excerpt of the transcript of the July 20, 2022 deposition of Plaintiffs’ Expert Jonathan Hochman.

4. Attached hereto as Exhibit C is a true and correct copy of an excerpt of the transcript of the July 18, 2022 deposition of Plaintiffs’ Expert Bruce Schneier.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct.

Executed in Washington, DC, on August 5, 2022.

DATED: August 5, 2022.

By /s/Carl Spilly
Carl Spilly